

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
EMERY, CA 94704

(415) 540-2043



October 31, 1985

Brad T. Fredette, Safety Director  
Southwest Marine of San Francisco, Inc.  
P.O. Box 7644  
San Francisco, CA 94120-7644

Dear Mr. Fredette:

This is in response to your letter of October 8, 1985 to Richard Wilcoxon, Chief of the division, regarding waste generation. Your letter described the situation in which you sandblasted a Navy ship, which resulted in a dispute over who was the generator of the spent sand. You attached two other letters written by this Department describing similar situations in which this Department determined that the Navy was the waste generator.

*Asbestos  
&  
bilge  
water* ← In the other situations described, the Navy was the generator since the waste was due to their actions or because the material removed from the ship was a hazardous waste as it was removed. However, in your case it is your actions, i.e., the sand blasting, which produces a potentially hazardous waste. Therefore, we do not believe that the previous letters by this Department apply.

We believe that if the sandblasting occurred at your facility then you would be the generator of the waste. If you did the sandblasting at a Navy shipyard then the Navy would be the generator. The appropriate identification number to use when shipping the wastes is the shipyard number.

If you have any questions, please call Wil Bruhns at (415) 540-2973.

Sincerely,

Dwight R. Hoenig, Chief  
North Coast California Section  
Toxic Substances Control Division

cc: Richard Wilcoxon - TSCD, Sacramento

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